

**AFFIDAVIT OF JOHN OLIVEIRA IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Task Force Officer John Oliveira, having been duly sworn, do hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Police Officer with the Somerville Police Department and have been so employed since 1997. In 2000, I was assigned to the Detective Bureau of the Somerville Police Department. In June 2008, I was assigned to the FBI Boston Division's Violent Crimes Task Force ("VCTF"), which comprises law enforcement officers from the FBI, Massachusetts State Police ("MSP"), and other local police departments. I have been sworn in as a Special Deputy U.S. Marshal. As a member of the VCTF, I am responsible for investigating kidnappings, murders, robberies, extortion, and other violent crimes. My investigations have included the use of surveillance techniques and the execution of search, seizure, and arrest warrants.

2. I submit this affidavit in support of a criminal complaint and arrest warrant charging Jaquan Barrows ("BARROWS"), year of birth 1997, with robbery interfering with interstate commerce, *i.e.*, Hobbs Act robbery, in violation of 18 U.S.C. § 1951(a), and using and brandishing a firearm during and in relation to, and in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c).

3. The information contained in this affidavit is based upon my involvement with this investigation and information supplied to me by other law enforcement officers. This affidavit is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint and arrest warrant. As such, I have not included each and every fact of this investigation, but instead have set forth only the most relevant facts that establish the requisite probable cause.

STATEMENT OF PROBABLE CAUSE

I. March 29, 2024 Robbery

4. On or about April 1, 2024, the FBI became involved in an investigation with the Revere Police Department (“RPD”) into the March 29, 2024 armed robbery of a Revere convenience store (“REVERE CONVENIENCE STORE”) located at 1247 N. Shore Road in Revere, Massachusetts.

5. I have reviewed a report authored by RPD officers recounting witness statements from the March 29, 2024 robbery. According the RPD report, RPD officers responded to the reported robbery at the REVERE CONVENIENCE STORE at approximately 8:36 a.m. on March 29, 2024. Officers spoke with the store clerk, who was present during the robbery (“Victim 1”), and the store owner (“Owner”). Victim 1 explained that at approximately 7:30 a.m. that morning, a male entered the REVERE CONVENIENCE STORE, pointed a handgun at Victim 1, and demanded money.

6. Victim 1 described the robber as wearing dark clothing, an orange traffic vest, a facemask, and light-colored gloves, and said that the robber spoke clear English. Victim 1 described the handgun as “silver colored.”

7. Victim 1 did not provide money to the robber upon his first demand. When Victim 1 refused, the robber walked behind the counter and opened the register.¹ After taking money from the register, the robber demanded more money from Victim 1. Victim 1 gave the robber approximately \$40 and his iPhone. Victim 1 stated that the robber then struck Victim 1 in the head with the handgun.² After striking Victim 1, the robber walked back to the front of the counter,

¹ A key was already in the register, allowing the robber to open it.

² Another officer reported that Victim 1 stated the robber struck him with the hand that was holding the handgun. It is not clear from the surveillance video whether Victim 1 was struck with the

took an ice cream bar from a cooler at the front of the store, and exited through the front door. Victim 1 observed the robber flee toward Sagamore Street.

8. I have also reviewed surveillance video from the REVERE CONVENIENCE STORE from the time of the robbery. In the video, I observed that at approximately 7:21 a.m.,³ a male wearing dark clothing with a hood, an orange safety vest with two reflective strips, light-colored gloves, and dark footwear entered the REVERE CONVENIENCE STORE. The male walked directly to the counter, leaned forward, and tossed a Target shopping bag under the plexiglass partition. He then slid his right hand underneath the partition and pointed a semi-automatic handgun toward Victim 1. The handgun appeared to be black with a silver/metallic portion in the center of the top slide. It also appeared to have a weapon-mounted flashlight or sight underneath the barrel.

9. Approximately 24 seconds later, the robber walked behind the counter and appeared to exchange words with Victim 1. The robber appeared to gather money from the cash register, and then exchange more words with Victim 1. Victim 1 then took cash from his wallet and handed it to the robber. A few seconds later, the robber used his right hand, which was holding the handgun, to strike Victim 1 on the head. Victim 1 then handed the robber what appeared to be a cell phone. The robber retrieved the Target shopping bag, took an ice cream bar from a freezer located directly in front of the counter, and exited the REVERE CONVENIENCE STORE at approximately 7:26 a.m.

handgun itself or with the hand holding the handgun, and I have not yet had the opportunity to clarify this point with Victim 1.

³ The timestamp on the surveillance video showed 8:26:51 a.m. Law enforcement determined that the timestamp on the REVERE CONVENIENCE STORE surveillance videos is approximately one hour and five minutes fast.

10. According to the RPD report, RPD officers were able to track Victim 1's phone using his Apple ID. The iPhone was recovered in a marsh area located on the northbound side of N. Shore Road between Bay Road and Ellerton Street in Revere, approximately 0.5 miles from the EVERETT CONVENIENCE STORE.

II. April 4, 2024 Robbery

11. I have reviewed a report authored by Everett Police Department ("EPD") officers recounting witness and victim statements from an April 4, 2024 robbery of a convenience store located at 543 Ferry Street, Everett, Massachusetts (the "EVERETT CONVENIENCE STORE").

12. According to the report, officers arrived at the EVERETT CONVENIENCE STORE at approximately 4:24 a.m. on April 4, 2024 in response to a reported armed robbery. EPD officers interviewed a store clerk ("Victim 2") who was present during the robbery. Victim 2 told EPD officers that the EVERETT CONVENIENCE STORE had been robbed approximately ten or fifteen minutes before the officers arrived. Victim 2 described the robber as a male wearing a black tracksuit and black ski mask. The robber came into the store and appeared to be grocery shopping, then after gathering a handful of items, walked up to the counter and asked Victim 2 for a pack of cigarettes. Victim 2 asked the robber to pay first, since Victim 2 would have to turn his back to retrieve the cigarettes. The robber then pulled out a black pistol and pointed it at Victim 2 and asked for all of the cash in the cash drawer. Victim 2 complied and gave the robber the cash, which he believed totaled around \$400 or \$500. The robber also asked Victim 2 for his cell phone, but Victim 2 refused. The robber told Victim 2 not to call the police, and then ran out of the store, taking a left out of the store parking lot onto Ferry Street.

III. Identification of BARROWS

13. On April 1, 2024, RPD officers, together with members of the FBI Violent Crimes Task Force, canvassed the area surrounding the REVERE CONVENIENCE STORE to locate surveillance footage from homes or businesses in the area. Officers recovered surveillance footage from a business located at 1247 N. Shore Road, located directly behind the REVERE CONVENIENCE STORE. The surveillance video showed a white Honda Pilot (the “VEHICLE”) pulling onto Shawmut Street from the direction of N. Shore Road at approximately 5:51 a.m.⁴ The VEHICLE parked on Sagamore Street, and a male exited and entered the VEHICLE several times. The male was wearing clothing that matched the clothes worn by the robber in the Revere Robbery: a dark hooded sweatshirt, dark pants, dark shoes, and an orange safety vest. The male walked in the direction toward the REVERE CONVENIENCE STORE multiple times. At approximately 7:26 a.m., the male ran from the direction of the REVERE CONVENIENCE STORE toward the VEHICLE. The male entered the VEHICLE and drove up Sagamore Street toward Revere Street at approximately 7:27 a.m.

14. Additional surveillance footage was recovered from a residence located at 474 Revere Street. This footage showed a white Honda Pilot arriving at the top of Sagamore Street and making a right turn onto Revere Street. This footage also showed that the VEHICLE appeared to be damaged around the front driver’s-side fender. The VEHICLE also had dark tinted windows.

15. Surveillance footage was also recovered from a residence located at 481 Revere Street. This footage showed the VEHICLE traveling toward N. Shore Road following the robbery.

⁴ Law enforcement determined that the timestamp on this surveillance footage was approximately 14 minutes fast. The times given in this Affidavit refer to real time, not the timestamp.

16. Officers were also able to capture footage of the VEHICLE using City of Revere cameras. This footage showed the VEHICLE making a left turn onto N. Shore Road at approximately 7:30 a.m. The intersection of N. Shore Road and Revere Street is approximately 0.3 miles from the location where Victim 1's phone was recovered.

17. RPD officers utilized license plate recognition software to conduct a query of vehicles matching the description of the VEHICLE traveling in Revere on the date of the REVERE ROBBERY. Officers located footage of a white Honda Pilot with Massachusetts registration number 4CRT95 traveling northbound on N. Shore Road at approximately 8:44 a.m. on March 29, 2024. The Honda Pilot appeared to have dark tinted windows. Officers obtained additional images of the vehicle with MA Reg. 4CRT95 showing damage to the front driver's side fender, matching the description of the VEHICLE.

18. Records maintained by the Massachusetts Registry of Motor Vehicles ("RMV") show that the VEHICLE is registered to an adult female, YOB 1996 ("PERSON 1"), at an address in Revere, Massachusetts (the "RESIDENCE"). The RESIDENCE is located north of Revere Beach Boulevard, close to where the VEHICLE was observed exiting N. Shore Road.

19. According to RPD records, PERSON 1 lived at the RESIDENCE with her boyfriend, JAQUAN BARROWS. RPD had responded to multiple domestic disturbances between BARROWS and PERSON 1, and had conducted an interview with BARROWS and PERSON 1 in October 2023 following an incident.

20. On April 3, 2024, RPD officers and I spoke to a building manager for the RESIDENCE's building. We were also able to secure surveillance footage from the RESIDENCE's building. I have reviewed that surveillance footage.

21. On the surveillance footage from the RESIDENCE from March 29, 2024, I observed that at approximately 7:53 a.m., the VEHICLE pulled into the driveway of the apartment building. The VEHICLE drove into the garage. A Black male then walked from the parking garage toward the main entrance of the apartment building. The male was wearing a dark hooded sweatshirt, dark pants, and dark footwear. He appeared to be carrying two brown paper bags. Surveillance footage showed that the male entered the building through the main entrance and turned left toward a storage closet. It appeared that the male used a key to access the door to the storage closet.

22. The RESIDENCE's building management explained that the area shown in the footage was a storage area, and that each unit in the building had its own respective storage area. Management informed us that the male seen in the surveillance footage resided in an apartment there.

23. Surveillance footage showed the male exit the storage area, take the elevator to the second floor, exit the elevator, and enter the RESIDENCE using a key.

24. We also reviewed surveillance footage to determine when the male resident of the RESIDENCE last left the apartment building prior to the March 29, 2024 robbery. Surveillance footage showed a male exit the RESIDENCE on March 28, 2024 at 8:31 p.m. The male was wearing a dark hooded sweatshirt and dark shoes. He also appeared to be wearing a dark jumpsuit, with the jumpsuit covering only his legs; the upper torso section of the jumpsuit was hanging loosely around his waist. An orange article of clothing also appeared to be hanging from the upper torso section of the jumpsuit.

25. The male accessed the storage area, using a key, at 8:31 p.m., and at approximately 8:33 p.m., left the storage area and exited the building, walking toward the parking garage.

26. The male's face appeared clearly in the surveillance footage from the RESIDENCE. By comparing the image of the male in the surveillance footage to photographs in RPD records and BARROWS' RMV driver's license photograph, RPD officers were able to identify the male as JAQUAN BARROWS.

27. On April 3, 2024, I, along with other members of the FBI Violent Crimes Task Force, conducted surveillance at the RESIDENCE. We observed BARROWS depart the RESIDENCE at approximately 8:20 p.m. BARROWS entered the VEHICLE and drove out of the parking lot onto N. Shore Road. We followed BARROWS to a convenience store located at 333 Eastern Ave. in Malden, Massachusetts. BARROWS parked the VEHICLE and remained in the running vehicle for over 90 minutes. Members of the surveillance team called the Malden Police Department to conduct a wellness check. Malden Police officers responded and conducted a field interview. BARROWS was the sole occupant of the VEHICLE, seated in the driver's seat. Malden officers reported that BARROWS was wearing dark clothing and had a dark ski mask on his face. BARROWS identified himself to the officers by presenting his Massachusetts driver's license. He told officers that he worked overnight and was taking a break. Once the interview concluded, BARROWS left the area.

28. As detailed above, early the next morning on April 4, 2024, a male wearing what was described as a "black track suit" and "black ski mask" robbed a convenience store located at 543 Ferry Street in Everett, Massachusetts, approximately 1 mile away from 333 Eastern Avenue in Malden.

IV. Search of BARROWS' Residence, Vehicle, and Person

29. On April 4, 2024, the Chelsea District Court issued a search warrant (2414SW0037) for the RESIDENCE, including the storage unit assigned to BARROWS' apartment unit, the white

Honda Pilot MA Reg. 4CRT95, and BARROWS' person for evidence, fruits, and instrumentalities of armed robbery, in violation of G.L. c. 265 § 17 (the "Search Warrant").

30. On April 4, 2024, at approximately 5:45 p.m., members of the FBI VCTF, together with RPD officers, executed the Search Warrant at BARROWS' residence. BARROWS was present in the home.

31. In the course of the execution of the Search Warrant, agents located and seized the following from the apartment, storage unit, and VEHICLE:

- A black semi-automatic handgun with a silver portion on the top, loaded with a 15 round magazine and 15 rounds of ammunition (14 rounds in the magazine and 1 round loaded in the chamber of the handgun);
- Dark blue pants;
- Black hooded sweatshirt with white writing across the front;
- Two orange reflective safety vests;
- One light-colored glove; and
- One dark blue jumpsuit.

32. The articles of clothing recovered during the execution of the Search Warrant matched the appearance of the clothing, safety vest, and gloves worn by the robber during the Revere Robbery.

33. BARROWS was arrested by RPD for armed robbery and possession of a firearm without a license and transported to the Revere Police Station for processing. After being advised of his *Miranda* rights, BARROWS agreed to speak with investigators. The interview was recorded. The statements below are summary in nature unless specifically indicated otherwise.

34. During the course of the interview, BARROWS admitted that on March 29, 2024 he robbed the REVERE CONVENIENCE STORE. BARROWS also admitted that on April 4, 2024, he robbed the EVERETT CONVENIENCE STORE.

35. When investigators asked why he struck Victim 1 with his handgun, BARROWS responded that he believed Victim 1 was reaching for a knife. BARROWS said that he understood that a person in Victim 1's situation would be fearful for their life, which in turn made BARROWS fear that Victim 1 could try to harm him.

CONCLUSION

36. Based on the foregoing, there is probable cause to believe that:

a. on or about March 29, 2024 and April 4, 2024, in Massachusetts, BARROWS did obstruct, delay, and affect, in any way and degree, commerce and the movement of any article and commodity in commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, that is, by taking and obtaining property, consisting of money and other valuable items, from the owners of the property against their will by means of actual and threatened force, violence, and fear of injury, in violation of 18 U.S.C. § 1951(a); and

b. on or about March 29, 2024 and April 4, 2024, in Massachusetts, BARROWS did use and brandish a firearm during and in relation to, and in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c).

/s/ John Oliveit's

John Oliveira
Det., Somerville Police Department
TFO, FBI Violent Crimes Task Force

SWORN to via telephone in accordance with Fed. R. Crim. P. 4.1 on April 9, 2024.

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HON. M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MASSACHUSETTS

